

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|-----------------------------------|---|----------------------------|
| SHEET METAL WORKERS LOCAL 265 |) | |
| WELFARE FUND, <i>et al.</i> , |) | |
| |) | |
| Plaintiffs, |) | CIVIL ACTION |
| |) | |
| vs. |) | NO. 08 C 1290 |
| |) | |
| UPDATE HEATING AND COOLING, INC., |) | JUDGE SAMUEL DER-YEGHIAYAN |
| an Illinois corporation, |) | |
| |) | |
| Defendant. |) | |

NOTICE OF MOTION

| | |
|--|---------------------------------|
| TO: Mr. Oonie F. Allen, Registered Agent/Secretary | Jesse White |
| Update Heating and Cooling, Inc. | Secretary of State |
| 16742 89 th Avenue | Department of Business Services |
| Orland Hills, IL 60487 | File No. 6206-4447 |
| | Springfield, IL 62756 |

YOU ARE HEREBY NOTIFIED that on **Thursday**, the **24th** day of **July 2008** at **9:00 a.m.**, or as soon thereafter as counsel can be heard, we shall appear before the Honorable Samuel Der-Yeghiayan, Judge of the United States District Court for the Northern District of Illinois, Eastern Division, in Courtroom 1903, 219 South Dearborn Street, Chicago, IL, and then and there present Plaintiffs' Motion for Entry of Default and for an Order Directing Defendant to Turn Over Monthly Fringe Benefit Contribution Reports. A copy of said motion is hereby served upon you.

/s/ Jennifer L. Dunitz-Geiringer

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Notice of Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 17th day of July 2008:

Mr. Oonie F. Allen, Registered Agent/Secretary
Update Heating and Cooling, Inc.
16742 89th Avenue
Orland Hills, IL 60487

Jesse White
Secretary of State
Department of Business Services
File No. 6206-4447
Springfield, IL 62756

/s/ Jennifer L. Dunitz-Geiringer

Jennifer L. Dunitz-Geiringer
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